

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
SOUTHEASTERN DIVISION**

CYNTHIA K. HAYNES,)
)
Plaintiff,)
)
v.) Cause No. 1:21-CV-00160-ACL
)
JENNIFER WILLIAMS, et al.)
)
Defendants.)

PLAINTIFF'S RESPONSE TO CASA'S MOTION TO QUASH

COMES NOW Plaintiff in response to this Court's Order (Doc. 96) of November 4, 2022 requiring Plaintiff to respond to CASA's Motion to Quash (Doc. 91) and apologizes to the Court for not informing the Court sooner that the parties had resolved their differences making the Motion to Quash moot.

Shortly after CASA's Motion to Quash was filed, the attorney for Plaintiff and the attorney for CASA discussed their differences which resulted in the attorney for CASA agreeing to produce CASA's records, Bates stamped, and with a business records Affidavit by November 3, 2022. See email from attorney for CASA to Plaintiff's attorney dated Thursday, October 6, 2022 attached hereto as Exhibit A. The parties had agreed that those records would be provided pursuant to a protective order.

On November 3, 2022 the attorney for CASA informed Plaintiff's attorney by email, a copy of which is attached hereto as Exhibit B, that she had the CASA records prepared for submission to all attorneys in the above captioned case, but inquired as to the

status of the protective order in this case. Although the protective order was to be filed approximately a month ago, it has not been finalized.

The parties to this case were supposed to submit a protective order to this Court by the beginning of October. The parties did not accomplish that. An attorney for Defendant Williams took responsibility to draft a protective order. After exchanges between Plaintiff's counsel and defense counsel, Plaintiff's counsel last requested that one word be removed from the first section, second paragraph of the then latest version of the protective order on October 31, 2022. Since then, Plaintiff's counsel has not heard from counsel for Defendant Williams. Should Plaintiff's counsel and defense counsel not be able to resolve that difference by November 14, 2022, Plaintiff's counsel will submit both versions of the protective order to the Court. Once a protective order is entered, CASA will produce its records protected by that order.

WHEREFORE, Plaintiff requests that this Court dismiss CASA's Motion to Quash as moot.

Respectfully submitted,

/s/ Laurence D. Mass

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CERTIFICATE OF SERVICE

It is hereby certified that on this 7th day of November 2022, a copy of the foregoing was filed electronically with the Clerk of the Court to be served to all counsel by operation of the Court's electronic filing system and to Ressie Thomas, attorney for CASA, via email (ressie@poplarblufflaw.net).

/s/ Laurence D. Mass